## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

THE DIRECT RESPONSE	) Case No. 07 CV 6301
RESOURCE, INC.,	)
an Illinois Corporation,	)
Plaintiff,	) Hon. Ronald A. Guzman
vs.	)
HIRSCH PRESENTATION SYSTEMS	)
USA, INC., a New Jersey Corporation,	)
Defendant and Third-Party Plaintiff	) ) )
VS.	)
HIRSCH BRACELET (HK) LTD.,	)
a Hong Kong Private Limited Company, and SCHENKER, INC., a New York	)
Corporation,	)
,	Ć
Third-Party Defendants.	)

# THIRD-PARTY DEFENDANT HIRSCH BRACELET (HK) LTD.'S MOTION TO DISMISS UNDER THE DOCTRINE OF FORUM NON CONVENIENS AND FOR LACK OF PERSONAL JURISDICTION

Third-Party Defendant Hirsch Bracelet (HK) Ltd., by its attorneys, respectfully moves to dismiss the Third-Party Complaint under the doctrine of *forum non conveniens* and for lack of personal jurisdiction. In support of its motion, Third-Party Defendant Hirsch Bracelet (HK) Ltd. submits the attached memorandum of law.

DATED: May 15, 2008

#### LAW OFFICE OF JOHN M. LAMBROS

By: /s/ John M. Lambros
John M. Lambros (pro hac vice)

65 Broadway, Ste. 813
New York, NY 10006
(212) 430-6474
(212) 208-2933 (Fax)
John@Lambroslawfirm.com

### **REED SMITH LLP**

By /s/ Gary S. Caplan
One of Its Attorneys

Gary S. Caplan (# 6198263) 10 South Wacker Drive, 40<sup>th</sup> Floor Chicago, Illinois 60606 (312) 207-1000 (312) 207-6400 (Fax) gcaplan@reedsmith.com

Attorneys for Third-Party Defendant

2180192

## **CERTIFICATE OF SERVICE**

I certify that on May 15, 2008, I electronically filed the foregoing THIRD-PARTY DEFENDANT HIRSCH BRACELET (HK) LTD.'S MOTION TO DISMISS UNDER THE DOCTRINE OF FORUM NON CONVENIENS AND FOR LACK OF PERSONAL JURISDICTION with the Clerk of the Court using the ECF system which will send notification of such filings to the following:

(See attached Service List)

By /s/ Gary S. Caplan

#### **SERVICE LIST**

Jordan B. Reich Kohner, Mann & Kailas, S.C. Washington Building 4650 North Port Washington Road Barnabas Business Center Milwaukee, WI 53212-1059 ireich@kmklawfirm.com

Stephen E. Vargo 77 West Washington Suite 1620 Chicago, IL 60602 svargo@mindspring.com

Alreen Haeggquist Haeggquist Law Group 501 W. Broadway Suite A-276 San Diego, CA 92101 alreen@haeggquistlaw.com

James Daniel Ellman Scopelitis Garvin Light & Hanson 30 W. Monroe Street Suite 600 Chicago, IL jellman@scopelitis.com

Stephanie A. Espinoza Marwedel, Minichello & Reeb, P.C. 10 South Riverside Plaza Suite 720 Chicago, IL 60606 sespinoza@mmr-law.com

2180262

Renee M. Mehl Kohner, Mann & Kailas, S.C. Washington Building 4650 North Port Washington Road Barnabas Business Center Milwaukee, WI 53212-1059 rmehl@kmklawfirm.com

Adam Carl Smedstad Scopelitis Garvin Light & Hanson 30 W. Monroe Street Suite 600 Chicago, IL asmedstad@scopelitis.com

Donald W. Devitt Scopelitis Garvin Light & Hanson 30 W. Monroe Street Suite 600 Chicago, IL ddevitt@scopelitis.com

Dennis Minichello Marwedel, Minichello & Reeb, P.C. 10 South Riverside Plaza Suite 720 Chicago, IL 60606 dminichello@mmr-law.com